

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63<sup>RD</sup> FLOOR  
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040  
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0886  
DIRECT EMAIL [jquinn@kaplanhecker.com](mailto:jquinn@kaplanhecker.com)

August 11, 2023

## VIA ECF

The Honorable Sarah L. Cave  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

*Re: McKoy, et al. v. The Trump Corporation, et al., No. 18 Civ. 09936 (LGS) (SLC)*

Dear Judge Cave:

We write on behalf of Plaintiffs pursuant to the Court's June 22, 2023 Order granting Plaintiffs' motion for leave to depose four non-party witnesses disclosed by Defendants, ECF 614, and the Court's July 19, 2023 Order granting the parties' joint request for an extension of time to complete those depositions, ECF 621, to report that the parties have now completed the depositions of Al Plumb, Devonne Richardson, John Barringer, and Angelique Davis.

The Court's June 22, 2023 Order also permitted Plaintiffs to renew their request for further discovery "on a showing of good cause following the Witnesses' depositions." ECF 614 at 3. Plaintiffs have requested certain additional discovery in light of testimony at the depositions, are in the process of conferring with counsel, and will bring any requests to the Court promptly upon completion of that meet-and-confer process.

Respectfully submitted,



John C. Quinn

*cc: All Counsel of Record (via ECF)*